

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 1/21/2014, 1/22/2014, 1/23/2014	Man Days: 3
Inspection Unit: Decatur Plaza	
Location of Audit: Decatur	
Exit Meeting Contact: Bob Roth	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Charles Gribbins,	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Bob Roth	Senior Quality Assurance Consultant	(217) 778-0785

Gas System Operations	Status
<u>Category Comment:</u> <i>All this information was checked at the Pawnee Training Center.</i>	
Gas Transporter	Various Gas Transporters
Miles of Main	Checked at Pawnee Training center
Confirm Operator's Potential Impact Radius Calculations	Various
<u>General Comment:</u> <i>Staff was provided a spreadsheet for the Potential Impact Radius Calculations.</i>	
Annual Report (Form 7100.2.1) reviewed for the year:	Pawnee

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Regulatory Reporting Records		Status
<u>Category Comment:</u> <i>This information was reviewed at the Pawnee Training Center.</i>		
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Checked
[191.15(a)]	Was a DOT Incident Report Form F7100.2 submitted within 30 days after detection of an incident?	Not Checked
[191.15(b)]	Were there any supplemental incident reports when deemed necessary?	Not Checked
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Checked
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Checked
[192.16(c)]	Customer Notification: Has the operator notified each customer after the customer first receives gas at a particular location?	Not Checked
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>This inspection was conducted in 2012 at Ameren's St. Louis General Office.</i>		
TEST REQUIREMENTS		Status
<u>Category Comment:</u> <i>Staff reviewed multiple installations performed in 2013 and observed that the piping was pressure tested as required. Leak and strength tests were performed where required.</i>		
[192.517(a)][192.505,192.507,192.509,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
UPRATING		Status
<u>Category Comment:</u> <i>No uprating was performed on transmission facilities in 2013.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable

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OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
General Comment: <i>The Ameren O&M was not reviewed as part of this audit, Staff will review the O&M at the Ameren Pawnee Training Center at a later time.</i>		
	Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?	Not Checked
General Comment: <i>The Operator Qualification plan was not reviewed as part of this audit. The OQ plan will be reviewed at the Ameren Training Center at a later time.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
General Comment: <i>Construction records were available through Ameren Gas Engineering and/or from the local service area headquarters. Maps are maintained in the mapping software being utilized such as Beyers Frame and a new system is now being activated and is GIS based. Ameren's Gas engineering performs the system design for work being completed on piping operating at or above 100 psig. These records were reviewed at the Decatur Plaza Office.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Not Applicable
General Comment: <i>This was not reviewed during this audit it will be reviewed during the record audit to be performed later at the Ameren Training Center located near Pawnee, Illinois.</i>		
[192.603(b)][192.605(c)(1)(i)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns?	Not Checked
General Comment: <i>Springfield Gas Control and Storage Operating Centers.</i>		
[192.603(b)][192.605(c)(1)(ii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside normal operating limits?	Not Checked
General Comment: <i>Springfield Gas Control and Storage Operating Centers.</i>		
[192.603(b)][192.605(c)(1)(iii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of loss of communications?	Not Checked
General Comment: <i>Springfield Gas Control and Storage Operating Centers.</i>		
[192.603(b)][192.605(c)(1)(iv)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of operation of	Not Checked

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	any safety device?	
General Comment: Springfield Gas Control and Storage Operating Centers.		
[192.603(b)][192.605(c)(1)(v)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property?	Not Checked
General Comment: Springfield Gas Control and Storage Operating Centers.		
[192.603(b)][192.605(c)(2)]	Does the operator maintain documentation of checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	Not Checked
General Comment: Springfield Gas Control and Storage Operating Centers.		
[192.603(b)][192.605(c)(3)]	Does the operator maintain documentation of notifying responsible operator personnel when notice of an abnormal operation is received?	Not Checked
General Comment: Springfield Gas Control and Storage Operating Centers.		
[192.603(b)][192.605(c)(4)]	Does the operator maintain documentation for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found?	Not Checked
General Comment: Springfield Gas Control and Storage Operating Centers.		
[192.603(b)][192.619,192.621,192.623]	Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory
General Comment: Staff was provided a document named (Gas Pressure Systems Containing Transmission Pipe), Staff reviewed the System MAOP information. The MAOP vary from 300 psi to 1450 psi.		
CONTINUING SURVEILLANCE RECORDS		Status
[192.709(c)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory

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<u>General Comment:</u>		
Staff reviewed the leak survey Patrols, leak tickets, staff also reviewed pipe examination sheets - information from the pipe examination sheets are logged into the data base for the corrosion department to review the data and take corrective action if necessary.		
CLASS LOCATION CHANGE		Status
[192.709(c)][192.609]	Does the operator maintain documentation when the class location changes for a segment of pipe operating at a hoop stress that is more than 40% SMYS?	Not Checked
<u>General Comment:</u>		
Staff to review the class location changes when the outside consultant is finished running a program for Ameren Illinois. Staff will be contacted when this review is completed.		
QUALIFICATION OF PIPELINE PERSONNEL		Status
<u>Category Comment:</u>		
The operator qualification plan was not reviewed as part of this audit. It will be reviewed during the record audit performed at the Ameren Training Center located near Pawnee, Illinois at a later time.		
Refer to operator Qualification Inspection Forms and Protocols		Not Checked
DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u>		
The Damage Prevention requirements will be reviewed during the record audit performed at the Ameren Training Center at a later time.		
[192.709(c)][191.17(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.709(c)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Checked
[192.709(c)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Checked
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action,	Not Checked

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	furnished copies of the latest edition of the Emergency Plan?	
<p>General Comment:</p> <p>Staff determined that emergency plans are being maintained at the storage field locations during the onsite inspections, and that they are a current version of the emergency plan, and that Storage Supervisors are provided a current copy of the emergency plan.</p> <p>For the engineering group located at the Decatur Plaza headquarters an electronic copy of the emergency plan is available on the Ameren Intranet. Staff verified that emergency plans are available at Decatur Plaza in electronic format.</p> <p>For the storage fields Staff to verify when these inspection are completed.</p>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Not Checked
<p>General Comment:</p> <p>Emergency Plan training was not reviewed during this audit this documentation is reviewed during the local inspections site audits such as storage fields and local service areas that maintain transmission facilities.</p>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Not Checked
<p>General Comment:</p> <p>Ameren reviews the actions taken by their personnel to establish they took the necessary actions to and followed the established procedures.</p>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Not Checked
<p>General Comment:</p> <p>This documentation is reviewed during the public awareness program audit and was not checked during this audit.</p>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Checked
<p>General Comment:</p> <p>This documentation to be reviewed during the local service areas who respond to leak complaints received on distribution and transmission facilities in their service areas. Staff will review the response times, investigations and the actions taken by storage personnel when responding to notifications of leaks and issues reported at storage fields. These records are maintained at the storage field and are reviewed when conducting the record audits at the Ameren storage fields.</p>		
[192.603(b)][192.615(a)(11)]	Has the operator maintained documentation of actions that were required to be taken by a controller during and emergency?	Not Checked
<p>General Comment:</p> <p>To be inspected at Springfield Office</p>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status

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<u>Category Comment:</u>		
<i>The Public Awareness Plan and records were not reviewed during this audit. The Public Awareness Plan will be reviewed during the record Audit performed at the Ameren Training Center located near Pawnee, Illinois at a later date.</i>		
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
ODORIZATION OF GAS		Status
<u>Category Comment:</u>		
<i>This documentation is reviewed during the Ameren local service center inspections and storage field inspections, due to the odorometer testing being performed by their personnel.</i>		
[192.709(c)][192.625(f)]	Where required, has the operator maintained documentation of odorant concentration level testing?	Not Checked
[192.709(c)][192.625(e)]	Where required, has the operator maintained documentation of odorizer tank levels?	Not Checked
PATROLLING & LEAKAGE SURVEY		Status
[192.709(c)][192.705]	Does the operator maintain documentation of a patrol program as required?	Not Checked
<u>General Comment:</u>		
<i>Staff reviewed the Gas Compliance records for transmission lines patrolling in the Gas Compliance System at the Pawnee Training Center. No issues were identified during the review. The following areas were reviewed IP, CILCO, and CIPS</i>		
[192.709(c)][192.706]	Does the operator maintain documentation of leakage survey(s) performed on a transmission pipeline?	Not Checked
<u>General Comment:</u>		
<i>Staff reviewed leak survey conducted for 2013 at the Pawnee Training Center, Staff did not encounter any issues at the time of inspection.</i>		
<i>Ameren Illinois is looking at the old CIPS territories and making some class location changes and reclassifying transmission pipeline as class III locations. They assigned new leak survey numbers and associating the new inspection with the old leak survey number for the correct leak survey cycles.</i>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<u>Category Comment:</u>		
<i>Staff reviewed work packets that contained information about purging pipe with natural gas and compressed air.</i>		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Satisfactory
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Satisfactory
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory

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[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Checked
<u>General Comment:</u> <i>The operator does not have any pipelines under or through a commercially navigable waterways.</i>		
COMPRESSOR STATION		Status
<u>Category Comment:</u> <i>Compressor Station requirements were not reviewed during this audit because there are no compressors utilized directly on the transmission system. The compressors owned and operated by Ameren are located and operated in conjunction with their storage operations. The records associated with the compressors are reviewed during the individual storage field audits.</i>		
[192.709(c)][192.731(a)]	Has the operator maintained documentation of the compressor station relief devices at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.731(c)]	Has the operator maintained documentation compressor station emergency shutdown at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.736(c)]	Has the operator maintained documentation of the compressor stations – detection and alarms?	Not Checked
PRESSURE LIMITING AND REGULATION		Status
<u>Category Comment:</u> <i>Staff was provided a list of systems containing transmission pipe and related pressure regulating equipment. Staff reviewed the record information on the GCS related to pressure regulating, but pressure limiting or regulation devices would still need to be reviewed at Operating Centers and Storage Facilities, Staff also reviewed the engineering evaluation for the transmission stations.</i>		
[192.709(c)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
[192.709(c)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
[192.709(c)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
[192.709(c)][192.743(a), 192.743(b), 192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Checked
<u>General Comment:</u> <i>Ameren is in the process of adding this protection if required in several locations Ameren has a higher MAOP then the delivery transmission company. Ameren did state that they were working on a six year time frame to complete the changes to over pressure protection.</i>		
[192.709(c)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Checked
<u>General Comment:</u>		

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VALVE MAINTENANCE		Status
<u>Category Comment:</u> Transmission valves were inspected at the Pawnee Training Center.		
[192.709(c)][192.745(a),192.745(b)]	Did the operator inspect and partially operate transmission valves that might be required during any emergency at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.749]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Checked
Investigation Of Failures		Status
[192.709(c)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
<u>General Comment:</u> There were no reported failures that required analysis on transmission system piping.		
WELDING OF STEEL PIPE		Status
<u>Category Comment:</u> Welder Qualification records to be checked during the Distribution record audit at Pawnee Training Center at a later date.		
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Not Checked
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Satisfactory
<u>General Comment:</u> This information was contained in the work packets.		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Satisfactory
<u>General Comment:</u> This information was contained in the work packets		
CORROSION CONTROL RECORDS		Status
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system	Satisfactory
[192.491][192.459]	Has the operator maintained documentation of	Satisfactory

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	examination when buried pipe was exposed?	
General Comment: <i>Review of pipe inspection forms completed during replacements or new installations reviewed indicate they were completed as required and had the required information recorded. No issues were identified due to the findings of the pipe inspections performed.</i>		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
General Comment: <i>Review of annual test points for 2013 on the transmission facilities indicate the inspections were completed within the allowable interval as required. There are no segments of transmission piping that are tested on a ten year interval.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Satisfactory
General Comment: <i>Ameren's O&M CORR 1 Requirements F. Rectifiers The inspection shall include current and voltage output of the rectifier. Pipe to soil readings not required.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Staff reviewed the GCS records and confirmed that critical bonds and non-critical bonds and noted they were inspected as required,</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
General Comment: <i>Ameren has a share point that currently maintains all information related to down readings and the corrective action taken and any other pending work orders related to down reading or corrective action.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Applicable
General Comment: <i>There is no unprotected steel piping located in the transmission system at Ameren Illinois.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation including casings?	Satisfactory
General Comment: <i>Staff reviewed casing in the GCS system that were related to the transmission system.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test	Satisfactory

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	stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Satisfactory
<u>General Comment:</u> <i>Staff did review several indications where test leads were replaced during construction or replacement of mains and services.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> <i>The operator has test points called (Adjacent Foreign Structures-Pipeline Crossing) reading were taken to verify they are not causing any problems to their structure or the foreign structures.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
<u>General Comment:</u> <i>Ameren does not transport corrosive gas in the transmission system downstream of their storage fields. Gas chromatographs are utilized to ensure the gas being received from storage facilities meets pipeline quality standards.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
<u>General Comment:</u> <i>Internal inspections were performed when piping was removed or tap coupons were removed during tapping. The findings are sent to the corrosion department for review and document retention.</i>		
[192.491]	Has the operator maintained documentation of written procedures supported by as-built drawings or other construction records?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the as-built drawings as part of the work packets associated with replacements and new construction on the transmission lines.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Satisfactory
<u>General Comment:</u> <i>Corrosion coupon monitoring results are reviewed during storage field audits. This documentation is retained at the storage fields and was not reviewed during this audit.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
<u>General Comment:</u>		

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<i>No corrective actions other than painting were required on transmission piping due to atmospheric corrosion in 2013.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
<u>General Comment:</u> <i>Atmospheric corrosion inspections were performed during the leak surveys performed on transmission piping surveyed in 2013.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Applicable
<u>General Comment:</u> <i>No transmission pipe was removed due to external corrosion in 2013.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
<u>Category Comment:</u> <i>These records to be reviewed at Pawnee Training Center with the Operator Qualification records review at a later time.</i>		
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked

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RECORD AUDIT

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